

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

BONHOMME INVESTMENT PARTNERS, LLC et al. )  
  )  
  )  
  )  
vs   ) Case No.: 4:13-cv-00475  
  )  
  )  
SHAUN R HAYES, et al.                                 )  
  )  
  )  
DEFENDANTS    )

**DEFENDANT HAYES'S ANSWER TO**  
**DEFENDANT FEDERAL DEPOSIT INSURANCE COMPANY**  
**FIRST SET OF INTERROGATORIES**

Comes now Defendant, Shaun R. Hayes and in answer to Defendant, Federal Deposit Insurance Company's First Set of Interrogatories states as follows:

Interrogatory # 1      Shaun R Hayes and during the period of time in question was a Consultant to Truman Bank, and President and Chief Executive Officer of Sun Security Bank.

Interrogatory #2      Defendant Shaun R Hayes is not in possession of any of the communication or correspondence as discussed in this interrogatory.

Interrogatory #3      Defendant Shaun R Hayes is not in possession of any of the communication or correspondence as discussed in this interrogatory. Nor does Defendant Hayes recall any specific conversation regarding this matter with the parties so described in this interrogatory.

Interrogatory # 4      Defendant Hayes had no relationship with Bancorp and FFC Financial Corporation. He was retained as a consultant by Truman Bank. He was a shareholder, Chief Executive Officer and President of Sun Security Bank. The statements above cover that period of time as defined within the interrogatories.

Interrogatory #5      Defendant Hayes is not privy to Mr Miller's ownership or positions in the matter.

Interrogatory #6      During the time in question, Davis was an officer of Truman Bank, while Defendant Hayes was a consultant. During that period of time, Hayes, Davis and Lehman were attempting to buy Truman Bank.

Interrogatory #7 Lehman was a customer of Sun Security Bank. During that period of time, Hayes, Davis and Lehman were attempting to buy Truman Bank.

Interrogatory #8 During the time in question Hayes served as a consultant for Truman Bank and Miller was a shareholder.

Interrogatory #9 Even though they were attempting to work together they never could get to a written agreement.

Interrogatory #10 Not Applicable

Interrogatory # 11 Not Applicable

Interrogatory # 12 Defendant Hayes did not take part in loan discussions at Sun Security regarding this matter in order to avoid conflicts of interest.

Interrogatory # 13 Defendant Hayes is not familiar with the transaction as he excluded himself from all the discussions and presentations.

Interrogatory # 14 Defendant Hayes was informed by the parties that they loan was to be paid off completely prior to closing and not from the proceeds from the subject transaction.

Interrogatory # 15 Defendant Hayes has no recollection of the discussions or the loan proposal at this time.

Interrogatory # 16 Defendant Hayes has no recollection of the discussions or the loan proposal at this time. Defendant Hayes has no written communication in his possession at this time.

Interrogatory # 17 Defendant Hayes has no recollection.

Interrogatory # 18 Defendant Hayes has no recollection. Defendant Hayes played no part in a trade of securities.

Interrogatory # 19 Defendant Hayes served as a consultant fro Truman Bank pursuant to a verbal agreement with bank management. Hayes had no relationship with Bonhomme except Davis, Lehman and Hayes were attempting to purchase Truman Bank.

Interrogatory # 20      Defendant has no recollection of an agreement as described in this interrogatory.

Interrogatory # 21      Defendant Hayes had no authority to sign documents for Truman Bank as he was only a consultant.

Interrogatory # 22      Defendant Hayes had no authority or requirement to act as a fiduciary for Truman Bank as he was only a consultant.

Interrogatory #23      Defendant Hayes was no such restriction nor is he in possession of any written agreement with Truman Bank.

Interrogatory # 24      No expert witnesses are planned at this time by Defendant Hayes.

Interrogatory # 25      No expert witnesses of any kind are planned at this time by Defendant Hayes.

The above answers to interrogatories and the information provided therein are true and accurate to best of my memory, knowledge and recollection.

Date \_\_\_\_\_

\_\_\_\_\_  
Shaun R Hayes  
Defendant

I hereby certify that on \_\_\_\_\_, September 2014, I served by First Class Mail, postage prepaid, as well as in PDF Format a copy of Defendant Hayes Answers to Defendant FDIC Interrogatories; to Attorneys for FDIC as well as copies to other Defendants and Plaintiff's.

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William Darmstaedter II  
Attorney for Defendant Hayes  
Mo Bar # 22591